

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

United States District Court
Southern District of Texas
FILED

MAY 25 2018

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

NORA ALANIZ

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§
§

Criminal No.

M-18-961

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

At all times material to this Information:

HEALTH CARE BENEFIT PROGRAMS

1. The Medicare program (Medicare) and the Texas Medicaid program (Medicaid) are each a "health care benefit program" as defined by Title 18, United States Code, Section 24(b), and affect interstate commerce.
2. Individuals who qualify for Medicare and/or Medicaid benefits are commonly referred to as "beneficiaries." Both Medicare and Medicaid provide qualified beneficiaries with prescription coverage for medication prescribed by a physician and filled by a licensed pharmacy.

THE DEFENDANT

3. Defendant NORA ALANIZ is a resident of Hidalgo County, Texas, and worked as a marketer for Riverside Pharmacy within the McAllen Division of the Southern District of Texas.
4. On multiple occasions between January 2017 through June 2017, the defendant met with, provided information to, Special Agents with the Federal Bureau of Investigation (the "Agents"). The Agents identified themselves as federal agents and informed the defendant that they were investigating allegations of fraud relating to federal health care programs. During the course of the interviews with the Agents, the defendant provided incomplete, false, and misleading

information. In addition, during the time period that the defendant was interviewed by the Agents, the defendant also met with an individual she knew to be a target of the investigation, during which meetings she provided information to the target in an effort to obstruct, mislead, and delay the investigation.

COUNT ONE
OBSTRUCTION OF CRIMINAL INVESTIGATIONS OF HEALTH CARE OFFENSES
(18 U.S.C. § 1518)

5. Paragraphs 1 through 4 are incorporated by reference as though fully restated and re-alleged herein.


6. Beginning on or about January 25, 2017 to June 23, 2017, in the McAllen Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

NORA ALANIZ

did willfully prevent, obstruct, mislead, or delay, and attempt to prevent, obstruct, mislead, or delay the communication of information or records relating to a violation of a Federal health care offense, to wit illegal remunerations, Title 42, United States Code, Section 1320a-7b, to an agent of the Federal Bureau of Investigation in relation to an illegal kickback scheme involving NORA ALANIZ, Riverside Pharmacy, and physician T.C.

All in violation of Title 18, United States Code, Section 1518.

RYAN K. PATRICK
UNITED STATES ATTORNEY


MARIAN SWANBERG
SPECIAL ASSISTANT UNITED STATES
ATTORNEY